



1095 Avenue of the Americas
New York, NY 10036-6797
+1 212 698 3500 Main
+1 212 698 3599 Fax
www.dechert.com

STEVEN A. ENGEL

steven.engel@dechert.com
+1 212 698 3693 Direct
+1 212 698 3599 Fax

September 30, 2014

VIA ECF AND ELECTRONIC MAIL

Hon. Cathy Seibel
United States District Court
300 Quarropas Street
White Plains, New York 10601

Re: *The Bloomingburg Jewish Education Center, et al. v. Village of Bloomingburg, et al.*
Docket No. 14-CV-7250 (CS)

Dear Judge Seibel:

On behalf of Plaintiffs, I write in response to the letter filed this afternoon by Mr. Terry Rice, Counsel for Defendants Town of Mamakating, the Town Board of the Town of Mamakating, the Planning Board of the Town of Mamakating, and William Herrmann (the “Mamakating Defendants”).

As Mr. Rice admits, the Mamakating Defendants were served weeks ago, and their time to respond is today. Rather than requesting an extension shortly after service, Defendants chose to wait until yesterday and then request an additional 30 days. I advised Mr. Rice that Plaintiffs could agree to an additional two weeks, but that a 30-day extension seemed excessive. The Mamakating Defendants have now asked the Court for an additional six weeks to respond.

Defendants object to the six-week extension because of the irreparable harm that Plaintiffs continue to suffer. As detailed in the Complaint, in an effort to prevent Hasidic Jews from moving into Bloomingburg, Defendants have completely blocked Plaintiffs from moving forward with development of a private religious school, a substantial housing development, and commercial properties. Plaintiffs are eager to move forward and fear that a six-week extension would cause unnecessary delay and thus prolong this ongoing harm. Accordingly, Plaintiffs respectfully request that the Court deny Defendants’ request for a six-week extension. Under the circumstances, Plaintiffs have no objection to the Court providing Defendants with an additional two weeks to respond, up to October 15, 2014.

Respectfully submitted,

/s/ Steven A. Engel

Steven A. Engel

cc: Terry Rice (via ECF)